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14 *Attorneys for Tecumseh-Infinity Medical  
15 Receivable Fund, LP*

16 **IN THE UNITED STATES BANKRUPTCY COURT  
17 FOR THE DISTRICT OF NEVADA**

18 In re:  
19 INFINITY CAPITAL MANAGEMENT, INC.  
20 Debtor.

21 Case No. 21-14486-abl  
22 Chapter 7

23 Adversary Case No. 21-01167-abl

24 HASELECT-MEDICAL RECEIVABLES  
25 LITIGATION FINANCE FUND  
26 INTERNATIONAL SP,

27 Plaintiff,

28 **AMENDED STIPULATION TO  
EXTEND DISCOVERY DEADLINES  
AND CONTINUE TRIAL DATE  
(THIRD REQUEST)**

17 TECUMSEH-INFINITY MEDICAL  
18 RECEIVABLES FUND, LP,

19 Defendant.

1 TECUMSEH-INFINITY MEDICAL  
2 RECEIVABLES FUND, LP,

3 Counter-Claimant,

4 v.

5 HASELECT-MEDICAL RECEIVABLES  
6 LITIGATION FINANCE FUND  
7 INTERNATIONAL SP,

8 Counter-Defendant.

9 HASELECT-MEDICAL RECEIVABLES  
10 LITIGATION FINANCE FUND  
11 INTERNATIONAL SP,

12 Counter-Claimant

13 v.

14 TECUMSEH-INFINITY MEDICAL  
15 RECEIVABLES FUND, LP,

16 Counter-Defendant.

17 **AMENDED STIPULATION TO EXTEND DISCOVERY DEADLINES AND  
CONTINUE TRIAL DATE (THIRD REQUEST)**

18 Tecumseh-Infinity Medical Receivables Fund, LP (“Tecumseh”), by and through its  
19 undersigned counsel, and HASelect-Medical Receivables Litigation Finance Fund International SP  
20 (“HASelect”), by and through its undersigned counsel (each a “Party” and, collectively, the  
21 “Parties”), hereby agree and stipulate, pursuant to Local Rule 7026, to extend discovery deadlines  
22 and trial as follows:

23 **A. Discovery Completed**

24 The following discovery has been completed:

25 1. On or about January 12, 2022, HASelect served a subpoena on nonparty Three Bell  
26 Capital.

27 2. On or about January 12, 2022, HASelect served a subpoena on nonparty Jonathan

1 Porter.

2       3. On or about January 17, 2022, Tecumseh served its Initial Disclosures pursuant to  
3 FRCP 26 on HASelect.

4       4. On or about January 18, 2022, HASelect served its Initial Disclosures pursuant to  
5 FRCP 26 on Tecumseh.

6       5. On or about March 10, 2022, HASelect served its First Set of Interrogatories and  
7 Requests for Production on Tecumseh.

8       6. On or about March 29, 2022, Tecumseh served its First Set of Requests for  
9 Production on HASelect.

10      7. On or about April 18, 2022, Tecumseh served its Responses to HASelect's First Set  
11 of Interrogatories and Requests for Production.

12      8. On or about May 18, 2022, HASelect served its Responses to Tecumseh's First Set  
13 of Requests for Production.

14      9. On or about August 29, 2022, Tecumseh served its First Set of Interrogatories and  
15 Requests for Admission as well as its Second Set of Requests for Production on HASelect.

16      10. On or about September 9, 2022, HASelect served its deposition notice for the  
17 deposition of Tecumseh.

18      11. On or about September 9, 2022, HASelect served deposition subpoenas on various  
19 nonparties.

20      12. On or about September 28, 2022, HASelect served its Responses to Tecumseh's First  
21 Set of Interrogatories and Requests for Admission as well as its Second Set of Requests for  
22 Production on HASelect.

23      13. On or about November 28, 2022, Tecumseh served its Third Set of Requests for  
24 Production on HASelect.

25      14. On or about December 2, 2022, Tecumseh served its Subpoena to Produce  
26 Documents to GPMicro, Inc.

27      15. On or about December 28, 2022, HASelect served deposition subpoenas on various  
28 nonparties.

1       16. On or about January 5, 2023, Tecumseh served deposition subpoenas for HASelect  
2 and other various nonparties.

3       **B. Discovery Remaining**

4       Discovery in this case has been ongoing and additional discovery remains to be completed,  
5 including, but not limited to:

- 6       1. Depositions of each party or the party's representative(s);
- 7       2. Depositions of various third parties;
- 8       3. Responses to outstanding written discovery;
- 9       4. Supplementation of prior written discovery;
- 10      5. Meet and confer regarding allegedly deficient discovery responses; and
- 11      6. Possible motion practice regarding allegedly deficient discovery responses.

12      The Parties reserve their right to take additional depositions based on information disclosed  
13 in produced documents or obtained in the depositions the Parties have identified.

14      **C. Reasons Why Discovery Will Not Be Completed Within the Time Limit of the Existing  
15 Deadlines**

16      This case is complex and involves thousands of accounts receivable purchased from more  
17 than 100 different medical providers. While this Court has already ruled on some of the issues  
18 regarding a subset of the accounts receivable at issue, other accounts receivable remain that require  
19 further discovery and analysis. The Parties have worked diligently by engaging in discovery from  
20 the outset of this case, but the extent of the documents produced in this matter are voluminous and  
21 require additional time for review. Further, although depositions have been noticed, they will likely  
22 need to be pushed back to accommodate the Parties as well as non-party deponents' schedules and  
23 receipt of further discovery from third party subpoenas and party disclosures. There are also  
24 outstanding issues regarding allegedly deficient discovery responses that will require that the Parties  
25 meet and confer, which may also require motion practice.

26      The Parties believe that, given the situation as it presently exists, discovery cannot be  
27 accomplished by the represented deadlines in the Order Granting the Parties' Stipulation to Extend  
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1 Discovery Deadlines (Second Request) on file herein [ECF No. 155]. This third stipulation to extend  
2 the existing discovery deadlines is brought in good faith and not for the purpose of delay. Based on  
3 the information presented in this Stipulation, the Parties believe that good cause exists to extend  
4 discovery as proposed in order to permit the Parties to ensure that discovery is conducted in a  
5 thorough manner and to continue trial.

6 **D. Proposed Agreement and Amended Discovery Schedule**

7 Based on the foregoing, the Parties stipulate and agree as follows, subject only to entry of  
8 the proposed order by this court approving this Stipulation, substantially in the form attached  
9 hereto as **Exhibit A**:

10 1. The Parties agree to extend the discovery deadlines as follows:

Event Deadline	Current Date	Proposed Date
Close of Fact Discovery	1/30/2023	3/30/2023
Dispositive Motion Deadline	3/2/2023	5/1/2023

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1	Final List of Witnesses and Exhibits	3/16/2023	5/15/2023
2	Expected trial ready date	3/31/2023	6/1/2023

3           2. This matter is presently scheduled to go to trial beginning on April 3, 2023. The  
 4 extension of discovery deadlines requested herein will require a continuance of the **five day trial**  
 5 to **June 1, 2, 5, 6, and 8, 2023 at 9:30 a.m.**

6           **IT IS SO STIPULATED.**

7           GARMAN TURNER GORDON LLP

SHEA LARSEN

8           By: /s/ Jared Sechrist  
 9           GERALD M. GORDON, ESQ.  
 10          JARED SECHRIST, ESQ.,  
 11          7251 Amigo St., Suite 210  
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 13          and  
 14          MICHAEL D. NAPOLI, ESQ.

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# EXHIBIT A

EXHIBIT A

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15	<i>Attorneys for Tecumseh-Infinity Medical Receivable Fund, LP</i>	
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17		
18	In re:	Case No. 21-14486-abl Chapter 7
19	INFINITY CAPITAL MANAGEMENT, INC.	
20	Debtor.	
21	HASELECT-MEDICAL RECEIVABLES	Adversary Case No. 21-01167-abl
22	LITIGATION FINANCE FUND	
23	INTERNATIONAL SP,	
24	Plaintiff,	
25	v.	
26	TECUMSEH-INFINITY MEDICAL	<b>ORDER GRANTING AMENDED STIPULATION TO EXTEND DISCOVERY DEADLINES AND CONTINUE TRIAL DATE (THIRD REQUEST)</b>
27	RECEIVABLES FUND, LP,	
28	Defendant.	

1 TECUMSEH-INFINITY MEDICAL  
2 RECEIVABLES FUND, LP,

3 Counter-Claimant,

4 v.

5 HASELECT-MEDICAL RECEIVABLES  
6 LITIGATION FINANCE FUND  
7 INTERNATIONAL SP,

8 Counter-Defendant.

9 HASELECT-MEDICAL RECEIVABLES  
10 LITIGATION FINANCE FUND  
11 INTERNATIONAL SP,

12 Counter-Claimant

13 v.

14 TECUMSEH-INFINITY MEDICAL  
15 RECEIVABLES FUND, LP,

16 Counter-Defendant.

17 **ORDER GRANTING AMENDED STIPULATION TO EXTEND DISCOVERY**  
**DEADLINES AND CONTINUE TRIAL DATE (THIRD REQUEST)**

18 The Court having considered the *Amended Stipulation to Extend Discovery Deadlines and*  
19 *Trial Readiness Date (Third Request)* (“**Stipulation**”),<sup>1</sup> by and between Tecumseh-Infinity Medical  
20 Receivables Fund, LP (“Tecumseh”), by and through its undersigned counsel, and HASelect-  
21 Medical Receivables Litigation Finance Fund International SP (“HASelect”), by and through its  
22 undersigned counsel, and finds that good cause exists to grant the relief requested. Accordingly:

23 **IT IS ORDERED** that the Stipulation is approved in its entirety.

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28 <sup>1</sup> Any capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

1           **IT IS FURTHER ORDERED** that the discovery deadlines are extend as follows:

2 <b>Event Deadline</b>	3 <b>Current Date</b>	4 <b>Proposed Date</b>
5           Close of Fact Discovery	6           1/30/2023	7           3/30/2023
8           Dispositive Motion Deadline	9           3/2/2023	10          5/1/2023
11          Final List of Witnesses and Exhibits	12          3/16/2023	13          5/15/2023
14          Expected trial ready date	15          3/31/2023	16          6/1/2023

17           **IT IS FURTHER ORDERED** that the extension of discovery deadlines requested herein  
 will require a continuance of the trial dates, and, therefore, the **five day trial** is scheduled for  
**June 1, 2, 5, 6, and 8, 2023 at 9:30 a.m.** in the Foley Federal Building and United States Courthouse,  
 300 Las Vegas Boulevard South, Las Vegas, Nevada, 89101, Third Floor, Courtroom #1.

18           **IT IS SO ORDERED.**

19           Prepared by:

20           GARMAN TURNER GORDON LLP

21           By: /s/      Jared Sechrist  
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 26           and

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